

DECLARATION OF ROBERT M. DEWITTY

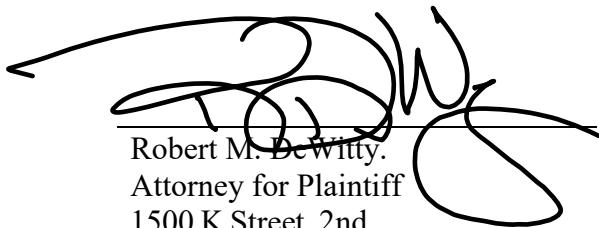
I, Robert M. DeWitty, of Washington D.C., declare as follows:

1. I am an attorney at law, admitted to practice before the Courts of the State of Maryland, the United States District Court for the Northern District of Illinois, and the United States Patent and Trademark Office. I am the attorney of record for Plaintiff NIPPON SEAL. I have personal knowledge of the following facts and I testify as follows:
2. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify the owner of each associated e-commerce store operating under the Seller Aliases and its contact information.
3. As of the filing of the action in this case (24-cv-11211), the Defendants listed on Schedule A (Sealed) continue to sell the same, infringing products.
4. Based on sales data of Plaintiff Nippon Seal's product based on the claims of the ***706 patent, Plaintiff's Manual Cleaning Instrument constitutes a significant part of Plaintiffs sales.
5. Based upon research performed by my office, Defendants are ready, able and willing to sell the same infringing product to consumers in the State of Illinois.
6. Based upon the number of reviews on online platforms such as TEMU.com, which is merely a fraction of total sales of product, defendants have generated hundreds of thousands of dollars in sales from their Infringing Manual Cleaning Instrument products.
7. Applying my skill as a licensed patent attorney, I can state the Defendants' Manual Cleaning Instrument products are the same, and each copy Plaintiff's claims.

8. The Defendants, individually, more than likely maintain off-shore bank accounts and move funds from their U.S. sales to these off-shore accounts. Executed on this the thirteenth day of November 2024 at Chicago, Illinois.

DATED: November 13, 2024

Respectfully Submitted:



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